

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IN RE INTEL CORP. MICROPROCESSOR  
LITIGATION

MDL Docket No. 05-1717-JJF

This Pleading Pertains to:

PHIL PAUL, on behalf of himself and on behalf of  
all others similarly situated,

Case No. 05-485-JJF

Plaintiffs,

vs.

INTEL CORPORATION,

Defendant.

**DECLARATION OF ADAM J. LEVITT IN SUPPORT  
OF THE NATIONAL PLAINTIFFS GROUP'S REPLY  
IN FURTHER SUPPORT OF THEIR MOTION FOR  
LEAVE TO FILE THEIR CONSOLIDATED COMPLAINT**

ADAM J. LEVITT declares and states as follows:

1. I am a partner in the law firm of Wolf Haldenstein Adler Freeman & Herz ("Wolf Haldenstein" or the "Firm"), counsel for the plaintiffs comprising the National Plaintiffs Group. I make this declaration in support of The National Plaintiffs Group's Reply in Further Support of Their Motion for Leave to File Their Consolidated Complaint (the "Reply Memorandum").

2. Attached hereto as Exhibit A is a true and correct copy of Wolf Haldenstein's May 8, 2006 letter to the attorneys comprising the Court-appointed Interim Class Counsel group in this case, discussing the National Plaintiffs Group's availability for a meet and confer teleconference, per the Court's May 4, 2006 directive, as soon as practicable.

3. Attached hereto as Exhibit B is a true and correct copy of Wolf Haldenstein's May 12, 2006 letter to the attorneys comprising the Court-appointed Interim Class Counsel group in this case, cataloging their concerns with Interim Class Counsel's consolidated complaint, again attaching proposed revisions to Interim Class Counsel's consolidated complaint, and suggesting additional revisions to the consolidated complaint which, if adopted as alternative claims, would have substantially cured the National Plaintiffs Group's concerns relating thereto.

4. Attached hereto as Exhibit C is a true and correct copy of a draft of Interim Class Counsel's new amended complaint that Interim Class Counsel sent to Wolf Haldenstein after business hours on May 19, 2006.

5. Attached hereto as Exhibit D is a true and correct copy of Wolf Haldenstein's May 22, 2006 letter to the attorneys comprising the Court-appointed Interim Class Counsel group in this case, advising Interim Class Counsel them that their proposed new amended complaint neither addressed the National Plaintiffs Group's concerns nor cured the deficiencies that led to the National Plaintiffs Group's initial criticisms thereof and proposed revisions thereto.


6. Attached hereto as Exhibit E is a true and correct copy of the draft of Interim Class Counsel's consolidated complaint, that Interim Class Counsel sent to Wolf Haldenstein on April 26, 2006.

7. Attached hereto as Exhibit F is a true and correct copy of Interim Class Counsel's April 28, 2006 email message to Fred T. Isquith, one of the counsel representing the National Plaintiffs Group, advising Mr. Isquith of Interim Class Counsel's decision to exclude the National Plaintiffs Group's plaintiffs, proposed alternative classes, and claims from their

consolidated complaint and Mr. Isquith's response email of even date advising Interim Class Counsel that they were not authorized to do so.

8. I declare the foregoing to be true and correct under penalty of perjury under the laws of the United States of America.

Executed at Chicago, Illinois, this 5th day of June, 2006.

  
Adam J. Levitt

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**CERTIFICATE OF SERVICE**

I, Robert D. Goldberg, undersigned counsel of record, hereby certify that on June 8, 2006, I caused a copy of the attached **DECLARATION OF ADAM J. LEVITT IN SUPPORT OF THE NATIONAL PLAINTIFFS GROUP'S REPLY IN FURTHER SUPPORT OF THEIR MOTION FOR LEAVE TO FILE THEIR CONSOLIDATED COMPLAINT** to be served on the following in the manner indicated:

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